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Attorneys for Plaintiff and Real Party in Interest

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

INTERNATIONAL CHURCH

FOURSQUARE GOSPEL,

Plaintiff,

v.

CITY OF SAN LEANDRO, MICHAEL)

J. GREGORY (in his official capacity),)

SURLENE G. GRANT(in her official)

capacity), DIANA M. SOUZA(in her)

official capacity), JOYSE R.)

STAROSCIACK (in her official)

capacity), BILL STEPHES (in his)

) Case No.: CO7-03605-PJH-JCS

)

) **DECLARATION OF YOUTH
PASTOR MATT LACEY IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

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Date: September 5, 2007

Time: 9:00 a.m.

Courtroom: 3

Hon.: Phyllis J. Hamilton

DECLARATION OF MATT LACEY

1 official capacity), JIM PROLA (in his)
2 official capacity), JOHN JERMANIS(in)
3 his official and individual capacities),)
4 DEBBIE POLLART (in her official and)
5 individual capacities), DOES 1-50,)
6 Defendants.)
7

8 FAITH FELLOWSHIP FOURSQUARE)
9 CHURCH,)
10)
11 Real Party in Interest.)
12

13 I, Matt Lacey, do hereby declare as follows:

14 1. That if called upon, I could and would testify truthfully, as to my own
15 personal knowledge, as follows:

16 2. I am the Youth Pastor at Faith Fellowship Worship Center, located at
17 577 Manor Boulevard, San Leandro, California 94579.

18 3. The conditions imposed by the City of San Leandro against my church
19 have had an adverse impact on Faith Fellowship's Youth Ministries and discipleship
20 programs.

21 4. My wife and I took over this ministry about five years ago with only 25
22 students. We now minister to upwards of 250 students weekly and have seen over
23 2,000 come through our doors since we started. However, space restrictions have
24 greatly inhibited the growth of Faith Fellowship's Youth Ministries. Everyday, we
25 ask ourselves the same questions that we asked when we first started. What are the
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DECLARATION OF MATT LACEY

1 needs of the youth in our society? How can we meet those needs and introduce them
2 to a life transforming committed relationship with Jesus Christ? As excited as we
3 are about the lives that have been impacted and the growth that we have seen, we
4 have been restricted from further growth and expansion due to the limitations at our
5 current facility.

6
7 5. Our youth buildings maximum capacity is around 250 people, not
8 including furniture, sound equipment, and other equipment used to run the meeting,
9 due to fire, and safety codes. Recently we have had to split our junior and senior
10 high into two separate nights. We would love to have them on the same night and
11 split them into two separate classes, but we do not have the space to do so. As we
12 continue to grow it will hinder us from ministering to anymore students with out
13 breaking the law due to space.

14
15 6. Then there is the parking problem. We have seen many parents come
16 to know Jesus and come to our church because of the change in their child. We see
17 that many of the troubled students are due to broken homes, so we encourage the
18 students to invite their parents. The problem is that when a parent/visitor arrives at
19 our church to find out that there is no parking for blocks it is very discouraging,
20 especially if there is a disability. As a result, many have not attended due to
21 parking.

1 7. We have a vision for after school discipleship programs. We want to
2 have a learning center free of charge, with computers and on site tutoring, as well as
3 hosting youth events, and conferences. By moving to the CATALINA PROPERTY
4 we will be gaining about 3,000 more square feet, which will almost triple our size.
5 We are committed to serving Jesus, the youth of our city, and we are just asking for
6 a little more space to do so.
7

8 8. Denial by the City of the use of the CATALINA PROPERTY has been
9 a substantial burden on our ability to evangelize, disciple, and provide social
10 services to the students.
11

12 I declare, under penalty of perjury under the laws of the State of California
13 and the United States of America, that the foregoing is true and correct and is of my
14 own personal knowledge, and indicate such below by my signature executed on this
15 12th day of July, 2007, in the County of Alameda, City of San Leandro.
16

17
18
19 /S/ Matt Lacey
20 Matt Lacey, Declarant
21

22 **Attorney Attestation re Signature**
23

24 I hereby attest that I have on file all holograph signatures for any signatures
25 indicated by a "conformed" signature (/S/) within this efiled document.
26
27

28 DECLARATION OF MATT LACEY

/S/ Kevin Snider

Kevin T. Snider

Mathew B. McReynolds

Peter D. MacDonald

Attorneys for Plaintiff and

Real Party in Interest

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DECLARATION OF MATT LACEY